

ALLAN R. FRUMKIN, ESQ. (SB #50543)
 PATRICK RIAZI, ESQ. (SB #224017)
 LAW OFFICES OF ALLAN R. FRUMKIN, INC.
 5900 King Road
 Loomis, CA 95650
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 Attorney for Creditor
 Law Offices of Allan R. Frumkin, Inc.

IN THE UNITED STATES BANKRUPTCY COURT

 IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

 SACRAMENTO DIVISION

In re:

 HERBERT EDWARD MILLER,

 Debtor.

Case Number: 2019-23392
 Chapter: 11

DCK NO.: ARF-01

DECLARATION OF ALLAN R. FRUMKIN
 IN SUPPORT OF CREDITOR LAW
 OFFICES OF ALLAN R. FRUMKIN'S
 MOTION TO DISMISS

Date: July 30, 2019
 Time: 10:30 a.m.
 Dept.: 35
 501 I Street, 6th Floor
 Sacramento, CA 95814
 Courtroom 33

I, Allan R. Frumkin, Esq., declare,

1. I am an attorney duly licensed to practice law by the State of California and am
 authorized to practice before this Court. I am counsel for the secured creditor, Law
 Offices of Allan R. Frumkin, Inc., in the above captioned matter. I make this declaration

In Re: Herbert Edward Miller

Motion to Dismiss

1 based on personal knowledge, and if called as a witness to testify to matters stated
2 herein, I would be willing and competent to do so.

3 2. Attached hereto as Exhibit A is a true and correct copy of a Grant Deed recorded in
4 Placer County whereby the Debtor was granted an ownership interest in real property
5 located at 11155 Shadow Court, Auburn, California 95602.

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7 3. Attached hereto as Exhibit B is a true and correct copy of a Grant Deed recorded in
8 Placer County indicating the Debtor's ownership interest in a non-disclosed LLC and the
9 transfer of real property located at 3252 Rayall Court, Loomis, California 95650.

10 4. Attached hereto as Exhibit C is a true and correct copy of a Grant Deed recorded in
11 Sacramento County whereby the Debtor transferred an ownership interest to real
12 property located at 11356 Alta Mesa East Road, Wilton, California 95693.

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14 5. Attached hereto as Exhibit D is a true and correct copy of the California Secretary of
15 State, Articles of Organization for Chino-Whistler, LLC indicating that the Debtor is the
16 sole owner of this LLC.

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18 6. Attached hereto as Exhibit E is a true and correct copy of the California Secretary of
19 State, Statement of Information for Schmook Ranch, LLC, an undisclosed business in
20 which the Debtor has an ownership interest in.

21 7. The Debtor has simply not been forthcoming with information concerning his income,
22 assets and expenses not listed in the petition while also been misleading about the
23 information concerning his income, expenses and assets listed in the petition. The
24 current bankruptcy was filed in bad faith and the Debtor has not painted a proper picture
25 of his assets, income and expenses making it difficult for creditors to ascertain the true
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In Re: Herbert Edward Miller

Motion to Dismiss

1 facts of the case. Ample cause exists for dismissal of this case and this case should be
2 dismissed with prejudice.

3 8. I believe this 2019 petition was filed in bad faith and an abuse of the bankruptcy
4 process.

5 I declare under penalty of perjury that the foregoing is true and correct and that this
6 declaration was executed in Loomis, California on JUN 24 2019.

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11 _____
12 Allan R. Frumkin, Esq.
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